

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	
	:	<b>Affirmation of Thane Rehn</b>
-v.-	:	
	:	
RAMSES OWENS,	:	
a/k/a "Ramses Owens Saad,"	:	<b>18 Cr. 693 (RMB)</b>
DIRK BRAUER,	:	
RICHARD GAFFEY,	:	
a/k/a "Dick Gaffey," and	:	
HARALD JOACHIM VON DER GOLTZ,	:	
a/k/a "H.J. von der Goltz,"	:	
a/k/a "Johan von der Goltz,"	:	
	:	
Defendants.	:	
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Thane Rehn, pursuant to Title 28, United States Code, Section 1746, hereby declares under penalty of perjury:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Southern District of New York. I respectfully submit this affirmation in support of the Government's motion regarding application of the crime fraud exception and waiver of the attorney-client privilege.
2. Attached hereto as Exhibit A is a true and correct copy of an email sent from a U.S. Law Firm Representative to AUSA Sarah Paul on or about May 11, 2016.
3. Attached hereto as Exhibit B is a true and correct copy of a Memorandum of Interview of Harald Joachim von der Goltz, drafted by IRS agents following a meeting with von der Goltz on or about May 19, 2016.
4. Attached hereto as Exhibit C is a true and correct copy of a transcript of a deposition of Harald Joachim von der Goltz, dated March 6, 2017.

5. Attached hereto as Exhibit D is a true and correct copy of a letter dated November 14, 2017, addressed to AUSA Sarah Paul from Jeffrey Neiman.

6. Attached hereto as Exhibit E is a true and correct copy of a letter dated July 10, 2018, addressed to Jeffrey Neiman from AUSA Sarah Paul.

7. Attached hereto as Exhibit F is a true and correct copy of a letter dated July 13, 2018, addressed to AUSA Sarah Paul from Jeffrey Neiman.

8. Attached hereto as Exhibit G is a true and correct copy of a letter dated July 24, 2019, addressed to Government counsel in this case, from Daniel Koffman.

Dated: New York, New York  
August 14, 2019



Thane Rehn  
Assistant United States Attorney  
Tel: 212-637-2354